

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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In re:	:
	:
THE FINANCIAL OVERSIGHT AND	:
MANAGEMENT BOARD FOR PUERTO RICO,	:
	:
as representative of	:
	:
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:
	:
Debtors.	:
-----X	

PROMESA
Title III
Case No. 17-BK-3283 (LTS)
(Jointly Administered)

WITHDRAWAL AS MOOT OF
ANSWER TO OBJECTION TO CLAIM
AND REQUEST FOR CONTINUANCE

CREDITOR QUEBRADA BONITA CRL, through its undersigned attorney, hereby states and prays the following, in response to the objection identified below:

1. On 6/27/2018 creditor Quebrada Bonita CRL¹ (“CBC”) filed Proof of Claim 55278 for \$65,000 against debtor EMPLOYEES RETIREMENT SYSTEM (“ERS”, or “Debtor”).
2. On 6/6/2019 Debtor filed its 39th Omnibus Objection (Non-substantive) of the Puerto Rico Highways and Transportation Authority and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims (ECF 7248), and included the appearing creditor’s claim (Item #68 in the list attached as Exhibit A thereto, at page 12 of 17) with the following reason for objecting:

Reason: Claimant purports to assert liabilities associated with mutual funds and/or bond(s) not issued by ERS or any of the other Title III debtors, and fails to provide any

¹ Due to a typographical error in the Proof of Claim (and thus in the objection) this creditor is referred to as **Qu**abrada Bonita, instead of Quebrada Bonita.. It is requested that Proof of Claim 55278 be deemed amended to correct said typo.

basis or supporting documentation for asserting a claim against ERS, such that the Debtors are unable to determine whether claimant has a valid claim against ERS or any of the other Title III debtors.

3. On 7/5/2019 the appearing creditor filed its answer to said 39th Omnibus Objection ... (ECF 7839) and a request for continuance (ECF 7840). Thereupon, the undersigned discussed this matter with debtor's attorneys, and we were able too clarify that the ground stated for the objection was in error, and that the claim was, notwithstanding, duplicate of the Master Bond Claim filed by the fiduciary.

4. On 7/17/2019 Debtor filed a *Notice of (A) Withdrawal of Objections to Certain Claims and (B) Submission of Amended Exhibits to Claim Objections* (ECF 8084) in which it clarifies, *inter alia*, the foregoing. The amended exhibits (and proposed order) now state that Proof of Claim 55278 is to be disallowed as a duplicate bond claim. (See its Exhibit 3, at Page 32 of 38).

WHEREFORE, we respectfully withdraw our reply (ECF 7839), and our request for continuance (ECF 7840).

I hereby certify that on this date I electronically filed the forgoing, with the Clerk of this Court using the CM-ECF system which will send notification of such filing to all CM-ECF participants registered to receive notices in the case at bar.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 18th day of July, 2019

EDGARDO MUÑOZ, PSC
364 Lafayette
San Juan PR 00917-3113
Tel. (787) 753-3888
Fax (787) 753-1147

s/ **EDGARDO MUÑOZ**
USDC NO. 125713
emunozPSC@gmail.com